

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

PATRICE SULTON,)	
)	
Plaintiff,)	
)	
v.)	Civil Case No: 1:18-cv-00826
)	
TULIPS CHICAGO, LLC,)	
)	
Defendant.)	

COMPLAINT

COMES NOW Plaintiff Patrice Sulton, by her attorney, William F. Sulton, Esq., and brings this action for monetary damages for personal injuries sustained as a result of a slip and fall at Studio Paris nightclub on Saturday, August 5, 2017.

PARTIES AND JURISDICTION

1. Plaintiff Patrice Sulton is an adult resident of the District of Columbia. She seeks more than \$75,000 in damages.
2. Defendant Tulips Chicago, LLC, is an Illinois Limited Liability Company. It owns and operates Studio Paris nightclub, located at 59 West Hubbard Street, Chicago, Illinois 60654.
3. Jurisdiction and venue are proper pursuant to 28 U.S.C. §§ 1332(a)(1) and 1391(b)(2).

COUNT I
Negligence

4. On August 5, 2017, Defendant, owned, possessed, controlled, maintained and managed a certain premises commonly described as Studio Paris nightclub.
5. Defendant owed a duty of care to Plaintiff, by and through its duly authorized agents and servants, to exercise all due care and caution for the safety of the Plaintiff and other members of the public on its premises.
6. Defendant disregarded its duty to Plaintiff, by and through its authorized agents and servants in that behalf, and negligently and carelessly allowed aforesaid premises unsafe to traverse by customers in its store
7. On August 5, 2017, Plaintiff was a business invitee and customer of Defendant in the aforesaid nightclub, and as such invitee and customer, she was properly on said premises.
8. On August 5, 2017, Plaintiff was in the nightclub, in a walkway, when she slipped and fell due to a slick thick unknown residue on the common floor area.
9. Defendant was then and there negligent in one or more of the following respects:
 - a. Carelessly and negligently failed to provide reasonably and safe premises for persons in said aisle;

- b. Carelessly and negligently failed to maintain the aforesaid walkway;
 - c. Carelessly and negligently permitted a slick thick unknown residue to be present on the floor in an area where customers traversed;
 - d. Carelessly and negligently failed to warn customers of the presence of the slick thick unknown residue on the floor of aisle;
 - e. Carelessly and negligently failed to clean the slick thick unknown residue on the floor after it knew or should have known that the slick thick unknown residue presented a danger to its customers;
 - f. Carelessly and negligently failed to maintain the premises in a good and safe condition for the Plaintiff and others
 - g. Failing otherwise to comply with the applicable laws and regulations of the State of Illinois and the applicable Federal laws and regulations;
 - h. Carelessly and negligently failed to exercise the degree of care required under the circumstances; and
 - i. Otherwise being negligent.
10. That as a direct and proximate result of one or more of the above set forth wrongful acts of negligence on part of Defendant, by and through its duly and authorized agents and servants, Plaintiff then and there suffered

injuries, incurred severe pain and suffering, incurred medical expenses, lost wages, Plaintiff has, may, and probably will for an indefinite time in the future suffer great pain, inconvenience, embarrassment, and mental anguish. Plaintiff has, may, and probably will for an indefinite time in the future be deprived of ordinary pleasures of life, loss of well-being, and equanimity, and her overall health, strength, and vitality has been greatly impaired, without any negligence of the Plaintiff contributing thereto

11. As a direct, foreseeable, and proximate result of the unlawful conduct complained of herein, Plaintiff suffered injuries, damages and other losses, including but not limited to medical expenses, lost earnings, loss of normal life, and emotional distress. Plaintiff has, may, and probably will for an indefinite time in the future suffer great expense, pain, inconvenience, embarrassment, and mental anguish. Plaintiff has, may, and probably will for an indefinite time in the future be deprived of ordinary pleasures of life, loss of well-being, and equanimity. Her overall health, strength, and vitality has been impaired. Plaintiff requests relief as hereinafter provided.

RELIEF REQUESTED

Wherefore, Plaintiff respectfully requests that this honorable Court enter judgment against Defendant and provide the following relief:

A. An order that Defendant pay all damages Plaintiff sustained as a result of the unlawful actions complained of herein, including, but not limited to medical expenses, lost earnings, loss of normal life, mental anguish, emotional distress and punitive damages, plus pre- and post-judgment interest and any applicable statutory penalties;

B. An order that Defendant pay all costs of action incurred herein, including reasonable attorneys' fees and expert fees to the extent available under local and federal law;

C. Retention of jurisdiction over this action to assure full compliance with the Orders of the Court; and

D. Such other and further legal and equitable relief as this Court deems just and reasonable under the circumstances.

DEMAND FOR JURY TRIAL

Plaintiff hereby requests a jury trial on all causes of action and claims with respect to which Plaintiff has a right to jury trial.

Dated this 1st day of February, 2018.

/s/ William F. Sulton, Esq.
WILLIAM F. SULTON, ESQ.

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